

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Objection Deadline: August 8, 2023

Hearing Date and Time:

August 22, 2023 at 10:00 a.m.

**NOTICE OF HEARING TO CONSIDER
APPROVAL OF DISCLOSURE STATEMENT
FOR AMENDED CHAPTER 11 PLAN OF REORGANIZATION OF
LTL MANAGEMENT LLC AND CERTAIN RELATED RELIEF**

PLEASE TAKE NOTICE THAT on June 26, 2023, LTL Management LLC (the “Debtor”) filed the *Amended Chapter 11 Plan of Reorganization of LTL Management LLC*

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

[Dkt. 912] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “Plan”).² On July 11, 2023, the Debtor filed:

- the *Disclosure Statement for Amended Chapter 11 Plan of Reorganization of LTL Management LLC* [Dkt. 1009] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “Disclosure Statement”); and
- the Debtor’s *Motion for Entry of Order (A) Approving Form and Manner of Notice of Hearing on Disclosure Statement; (B) Approving Disclosure Statement; (C) Establishing Solicitation and Tabulation Procedures; (D) Scheduling a Hearing on Confirmation of Amended Chapter 11 Plan and Approving Form and Manner of Notice Thereof; and (E) Granting Related Relief* [Dkt. 1011] (the “Solicitation Procedures Motion”).

The Plan provides a mechanism by which Talc Personal Injury Claims against the Debtor will be channeled to a trust established pursuant to sections 524(g) and 105(a) of the Bankruptcy Code. Upon approval of the Disclosure Statement, the Debtor intends to solicit holders of Talc Personal Injury Claims and Equity Interests of the Debtor for support of the Plan.

PLEASE TAKE FURTHER NOTICE THAT:

1. The United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”) has scheduled a hearing for **August 22, 2023 at 10:00 a.m. (prevailing Eastern Time)** (the “Disclosure Statement Hearing”) to determine whether to, among other things, approve the Disclosure Statement as containing “adequate information” within the meaning ascribed to such term in section 1125 of the Bankruptcy Code and to consider whether to approve certain procedures for soliciting and tabulating votes to accept or reject the Plan (the “Solicitation Procedures”). At the Disclosure Statement Hearing, the Bankruptcy Court will consider all of the relief sought in the Solicitation Procedures Motion, including whether to allow Talc Personal Injury Claims solely for voting purposes in the amount of \$1.00 in the aggregate per claimant pursuant to Bankruptcy Rule 3018(a).

2. The Disclosure Statement Hearing will be held before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the Bankruptcy Court, located at the Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Courtroom No. 8, Trenton, New Jersey 08608. The Disclosure Statement Hearing may be continued from time to time without further notice other than the announcement of the adjourned date(s) at the Disclosure Statement Hearing or any continued hearing or as indicated in any notice of agenda of matters scheduled for hearing filed with the Bankruptcy Court. If the Disclosure Statement Hearing is continued, the Debtor will post the new date and time of the Disclosure Statement Hearing at <https://dm.epiq11.com/ltl>. The Disclosure Statement and Plan may be modified, if necessary, in accordance with the Bankruptcy Code, the Bankruptcy Rules, and other applicable law, before, during, or as a result

² Capitalized terms used but not otherwise defined herein have the meanings given to such terms in the Plan.

of the Disclosure Statement Hearing, without further notice to creditors or other parties in interest.

3. Copies of the Solicitation Procedures Motion (including the Solicitation Procedures and the other exhibits to the proposed order approving the Solicitation Procedures Motion), Disclosure Statement, and Plan are available for review free-of-charge on the website maintained by the Debtor's claims, noticing, balloting and solicitation agent, Epiq Corporate Restructuring, LLC (the "Solicitation Agent"), at <https://dm.epiq11.com/case/ltl>. Copies of the foregoing are also available upon request by contacting the Solicitation Agent at LTLVote@epiqglobal.com or at (888) 431-4056 (Toll-Free) or +1 (503) 822-6762 (International).

4. Responses and objections, if any, to approval of the Disclosure Statement or any of the other relief sought by the Debtor in the Solicitation Procedures Motion, including approval of the Solicitation Procedures and the allowance of Talc Personal Injury Claims solely for voting purposes in the amount of \$1.00 in the aggregate per claimant pursuant to Bankruptcy Rule 3018(a), must: (a) be in writing; (b) conform to the Bankruptcy Rules and the Local Rules of U.S. Bankruptcy Court for the District of New Jersey (the "Local Bankruptcy Rules"); (c) state the name, address, telephone number and email address of the objecting party and the amount and nature of the Claim or Equity Interest of such party; (d) state with particularity the basis and nature of any objection or response and include, where appropriate, proposed language to be inserted in the Disclosure Statement to resolve any such objection or response; and (e) be filed, together with proof of service, with the Bankruptcy Court and served so as to be actually received on or before **August 8, 2023** by:

(a) counsel to the Debtor, (i) Jones Day, 2727 N. Harwood Street, Dallas, TX 75201 (Attn: Gregory M. Gordon, Brad B. Erens, Dan B. Prieto, and Amanda Rush) and (ii) Wollmuth Maher & Deutsch LLP, 90 Washington Valley Road, Bedminster, NJ 079211 (Attn: Paul R. DeFilippo, James N. Lawlor, and Joseph F. Pacelli);

(b) counsel to the TCC, (i) Brown Rudnick LLP, Seven Times Square, New York, New York 10036 (Attn: David J. Molton, Michael S. Winograd, Susan Sieger-Grimm, and Kenneth J. Aulet) and One Financial Center, Boston, Massachusetts 02111 (Attn: Jeffrey L. Jonas, Sunni P. Beville, and Eric R. Goodman) and (ii) Genova Burns LLC, 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920 (Attn: Daniel M. Stolz, Donald W. Clarke, and Gregory S. Kionoian);

(c) the FCR (i) Randi S. Ellis, LLC, 5757 Indian Circle, Houston, TX 77027 (Attn: Randi S. Ellis) and (ii) counsel to the FCR, Walsh Pizzi O'Reilly Falanga LLP, Three Gateway Center, 100 Mulberry Street, 15th Floor, Newark, New Jersey 07102 (Attn: Mark Falk, Stephen V. Falanga, and Liza M. Walsh);

(d) counsel to the Ad Hoc Committee of Supporting Counsel, (i) Paul Hastings LLP, 200 Park Avenue, New York, New York 10166 (Attn: Kris Hansen) and 71 South Wacker Drive, Suite 4500, Chicago, Illinois 60606 (Attn: Matthew M. Murphy and Matthew Micheli); and (ii) Cole Schotz P.C., Court Plaza North, 25 Main Street, P.O. Box 800, Hackensack, New Jersey 07692-0800 (Attn: Michael D. Sirota); and

(e) the Office of the United States Trustee for the District of New Jersey, One Newark Center, Ste 2100, Newark, New Jersey 07102 (Attn: Jeffrey M. Sponder and Lauren Bielskie).

5. The Debtor and any other party in interest may file a response in support of approval of the Disclosure Statement or any of the other relief sought by the Debtor in connection with the Solicitation Procedures Motion on or before **August 18, 2023**.

6. IF ANY OBJECTION TO THE DISCLOSURE STATEMENT IS NOT FILED AND SERVED AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE ADEQUACY OF THE DISCLOSURE STATEMENT AND MAY NOT BE HEARD AT THE HEARING.

7. IF ANY OBJECTION TO THE SOLICITATION PROCEDURES, INCLUDING ANY CHALLENGE TO THE ALLOWANCE OF TALC PERSONAL INJURY CLAIMS SOLELY FOR VOTING PURPOSES IN THE AMOUNT OF \$1.00 IN THE AGGREGATE PER CLAIMANT PURSUANT TO BANKRUPTCY RULE 3018(A), IS NOT FILED AND SERVED AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE SOLICITATION PROCEDURES OR CHALLENGING THE ALLOWANCE OF TALC PERSONAL INJURY CLAIMS SOLELY FOR VOTING PURPOSES IN THE AMOUNT OF \$1.00 IN THE AGGREGATE PER CLAIMANT AND MAY NOT BE HEARD AT THE HEARING.

8. Following approval of the Disclosure Statement by the Bankruptcy Court, holders of Impaired Claims or Interests against the Debtor will receive a copy of the Disclosure Statement, the Plan, and various documents related thereto, unless otherwise ordered by the Bankruptcy Court. Holders of unclassified claims and claims in the non-voting classes will receive a Notice of Non-Voting Status and Confirmation Hearing Notice (each, as defined in the Solicitation Procedures Motion).

9. THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE PLAN. VOTES ON THE PLAN MAY NOT BE SOLICITED UNLESS AND UNTIL THE PROPOSED DISCLOSURE STATEMENT IS APPROVED BY AN ORDER OF THE COURT.

Dated: July 11, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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